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March 24, 2023

**VIA ELECTRONIC CASE FILING
& ELECTRONIC TRANSMISSION**

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Walkie Check Productions, LLC* [“Walkie Check” or “Plaintiff”] v.
ViacomCBS Inc., Black Entertainment Television LLC d/b/a BET Networks, and
BET Productions IV, LLC [“Defendants”] (S.D.N.Y. Case No. 1:21-cv-01214-KPF)

Dear Judge Failla:

We represent Plaintiff Walkie Check Productions, LLC in the above-referenced action and write, pursuant to Rule 9(C) of Your Honor’s Individual Rules of Practice in Civil Cases (revised March 2, 2021), to seek leave to file under seal select documents and information related to Plaintiff’s opposition to Defendants’ motion for summary judgment and Plaintiff’s cross-motion for spoliation sanctions.

The documents and information Plaintiff seeks to file under seal consist of documents and information Defendants previously designated for filing with the Court under seal. In addition, in selecting the documents and/or information for proposed sealing, Plaintiff has attempted to limit the scope of its proposed sealing to that information that is necessary.

Thank you very much for your time and attention to this submission.

Respectfully submitted,

/s/ Kenneth E. Aldous
Kenneth E. Aldous

cc: Wook Hwang, Esq. (via electronic case filing & electronic transmission)

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket entry 104.

Dated: March 27, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE